

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

DAVID BUSH AND : No. 07-4936
CHRISTOPHER BUSH :
vs. :
: :
S.C. ADAMS, LT., et al:

Thursday, January 7, 2010

Deposition of STEVEN J. IGNATZ,
taken pursuant to notice at the offices
of Attorney General, Norristown,
Pennsylvania, on the above date,
beginning at approximately 9:50 a.m.
before Barbara C. Stalheim, Certified
Shorthand Reporter and Notary Public.

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2 COUNSEL APPEARED AS FOLLOWS:

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5 OFFICE OF ATTORNEY GENERAL
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Litigation Section
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8 for the Defendants

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2 I N D E X

3 WITNESS PAGE

4 STEVEN J. IGNATZ

5 By Mr. Puricelli 4

6 - - -

7 E X H I B I T S

8 NUMBER MARKED

9 Ignatz-1 61

10 Ignatz-2 63

11 Ignatz-3 78

12 Ignatz-4 90

13 Ignatz-5 118

14 - - -

15 EXHIBITS ATTACHED TO ORIGINAL COPY OF

16 TRANSCRIPT ONLY

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(It is hereby stipulated
and agreed by and between counsel for
the respective parties that signing,
sealing and certification are waived;
and that all objections, except as to
the form of the question, are reserved
to the time of trial.)

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STEVEN J. IGNATZ, after
having been duly sworn, was examined as

12 follows:

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P R O C E E D I N G S

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BY MR. PURICELLI:

17

Q. All right. Lieutenant Ignatz,
forgive me if I pronounce your name. I'll
tell you right off the bat I tend to butcher
everybody's name, sometimes even my own. So
don't take it as an offense, please.

18

Okay. Am I close?

19

A. Ignatz.

20

Q. Ignatz.

1 STEVEN J. IGNATZ

2 Okay. Is there any other
3 name you prefer me to call you other than
4 Lieutenant Ignatz?

5 A. Whatever works for you is fine
6 with me.

7 Q. Well, sometimes I'll say sir
8 then.

9 I'm Brian Puricelli. I
10 represent the plaintiffs in this case. As
11 you are aware, I'm sure by now, you're a
12 named defendant in the case. Perhaps after
13 this deposition you won't be. We'll see.

14 Have you ever been deposed
15 before?

16 A. Yes.

17 Q. Okay. And have you been at least
18 become familiar with the instructions when we
19 say usual stipulations?

20 A. Yes. I believe so.

21 Q. Okay. I'm going to ask
22 questions. You're going to hopefully be able
23 to provide answers for them. The two
24 objections that control here are form of the
25 question. If that's raised we're going to

1 STEVEN J. IGNATZ

2 want to know if you understand the question.

3 And the other one is

4 privilege. So if I ask you an area which
5 your attorney believes is an area privileged
6 at law, meaning I can't ask questions in that
7 area and then we'll move on and allow the
8 judge to decide whether or not you do or
9 don't have to answer that question.

10 Okay. Aside from that
11 it's important that you answer all questions
12 orally. Up and down, sideways, motions of
13 the head although can be noted, they're
14 difficult for people reading the transcript
15 and it's also hard for the court reporter.

16 Second is to talk only one
17 at a time. I'm guilty of that myself, but it
18 helps the court reporter tremendously and
19 aids us, as well, by allowing us to have a
20 clean transcript.

21 Do you understand that?

22 A. Yes, sir.

23 Q. Okay. If I ask you a question,
24 whether it's because I use words that are
25 inappropriate or delay in my questioning,

1 STEVEN J. IGNATZ

2 which I sometimes do, please tell me you
3 don't understand the question. I will try to
4 rephrase it or explain it to you so that you
5 do understand it.

6 Is that okay?

7 A. Yes, sir.

8 Q. All right. If you don't
9 understand at all anything simply tell us.
10 Don't guess. Don't assume.

11 If you're going to
12 approximate something let us know you're
13 approximating something. Okay?

14 A. Will do.

15 Q. All right.

16 MR. PURICELLI: Anything
17 you want to instruct your witness?

18 MR. HENZES: No. That's
19 fine.

20 BY MR. PURICELLI:

21 Q. Okay. All right. Have you read
22 anything to prepare for today's deposition?

23 A. Yes.

24 Q. What did you read?

25 A. I just looked over previous

1 STEVEN J. IGNATZ

2 transcript from when we were -- when we met
3 previously.

4 Q. Okay. I'm going to show you an
5 October 24, 2008 transcript I have and let me
6 know whether or not this is what you say you
7 reviewed for today.

8 I think if you turn to 154
9 of that document you'll see your testimony.

10 MR. HENZES: There's 184.

11 We're almost getting there.

12 MR. PURICELLI: 154.

13 - - -

14 (Discussion held off the
15 record.)

16 - - -

17 THE WITNESS: Yes. This
18 is what I reviewed.

19 BY MR. PURICELLI:

20 Q. All right. So if I were to ask
21 you the same questions would the answers
22 today be the same?

23 A. Yes, sir.

24 Q. All right. There's nothing --
25 having reviewed it, there's nothing you want

1 STEVEN J. IGNATZ

2 to change in there.

3 Correct?

4 A. That's correct.

5 Q. All right.

6 MR. PURICELLI: So it's
7 all right we just adopt that testimony,
8 Randy?

9 MR. HENZES: If that's
10 what you want to do, that fine.

11 BY MR. PURICELLI:

12 Q. All right. Aside from reading
13 your transcript did you review any other
14 documentation?

15 A. No.

16 Q. Okay. Have you suffered any
17 mental or physical occurrences or taken any
18 types of medications, legal or otherwise,
19 that would impair your ability to recall
20 facts today?

21 A. No.

22 Q. Okay. And the transcript
23 indicates your history with the State Police.

24 Is that correct?

25 A. Yes.

1 STEVEN J. IGNATZ

2 Q. Okay. Aside from that history,
3 do you have any other law enforcement
4 history?

5 A. Yes.

6 Q. Okay. And what is that history?

7 A. From 1982 -- from January of 1982
8 until April 14 of 1985 I was a municipal
9 police officer.

10 Q. Where?

11 A. In Armstrong County for the
12 boroughs of Leechburg, that's
13 L-E-E-C-H-B-U-R-G, and Gilpin, G-I-L-P-I-N,
14 Township. I was a part-time officer for both
15 municipalities.

16 Q. Okay. I assume then that you
17 attended the State Police Training Academies
18 for municipal police officers back then?

19 A. I attended the Municipal Police
20 Training Academy sponsored by Indiana
21 University of Pennsylvania.

22 Q. Okay. And between '82 and '85
23 did you continue to have your updates?

24 A. Yes, sir.

25 Q. Okay. Aside from that have you